

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION
Civil Action No. 6:18-CV-01327-DCC

JANE ROE,)
)
Plaintiff,)
)
v.)
)
FURMAN UNIVERSITY, BETA THETA PI,)
THE ZETA LAMBDA CHAPTER OF BETA)
THETA PI, UPSTATE AFFILIATE)
ORGANIZATION D/B/A GHS, AND JOHN)
DOE,)
)
Defendants.)
_____)

**MOTION FOR ENTRY OF
CONFIDENTIALITY AND SEAL
ORDER**

The attached proposed Confidentiality and Seal Order is requested by consent of all parties.

The attached proposed Confidentiality and Seal Order is a modified version of the standard form on the court’s website and the modifications have been indicated by attaching a “redlined” copy the document. An explanation of the basis for each proposed modification is as follows:

Furman University is subject to the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232(g); 34 C.F.R. Part 99 *et seq.* (FERPA), which provides certain confidentiality protections for the educational records of its students and former students. In light of these privacy obligations on the part of Furman University, and the sensitive nature of the subject matter of this civil action, Paragraph 4 of the proposed Confidentiality and Seal Order provides specific protections for the exchange and filing of documents containing confidential student educational information.

This 4th day of October, 2018.

WE SO MOVE/CONSENT:

[SIGNATURES APPEAR ON NEXT PAGE]

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